DECLARATION

I, Ophir Frieder, as declarant, being warned that willful false statements and the like are punishable by fine or imprisonment, or both under 18 U.S.C. 1001, and may jeopardize the validity of the application or any patent issuing therefrom, hereby declare:

1. I am the IITRI Chair Professor of Computer Science at the Illinois Institute of Technology. I have over ten years of experience in the field of information retrieval.

2. I have read and understand the specification of the Hobbs patent references 5,987,454 and 6,523,022 as cited in the Examiner's Office Action of 31 December 2003 in US Patent Application No. 09/837,436.

3. I have read and understand the specification of Patent Application No. 09/837,436 and am an inventor thereof.

4. Hobbs references 5,987,454, at column 2, lines 25-35 states the nonsequitor:
"One limitation of existing information retrieval systems, especially among the commercial Data Warehouses..."
This statement in a nonsequitor because an "information retrieval system" as known in the art, and a "data warehouse" as known in the art, are two separate concepts. A data warehouse is a repository of multifaceted data where the data are commonly accessed as if of a structured data source. An information retrieval system commonly contains an aggregation of texts which are searched using information retrieval search techniques that treat data as if in an unstructured data source as known in the state of the art, e.g., search technology as illustrated in the book by the inventors of the present invention: D. Grossman and O. Frieder, *Information Retrieval: Algorithms and Heuristics*, Kluwer Academic Publishers, ISBN 0-7923-8271-4, 1998. Thus, how a data repository is searched is as important to its classification as the data themselves. The Hobbs patent references teach the use of information retrieval search techniques that treat text data as unstructured data sources.

5. LEXIS, and other multiple databases are not data warehouses within the accepted meaning of that term as defined in the specification of Patent Application No. 09/837,436 and as understood in the current art. LEXIS and the other commercial information databases cited by Hobbs reference 6,523,022 are generally aggregations of text data searched by information retrieval techniques that treat data as unstructured with no sense of structure such as attributes in the structured context, as in a data warehouse.

6. Accordingly it is my belief as a person of skill in the art of data warehousing and information retrieval, that LEXIS cannot be considered a data warehouse as it is commonly understood in the art, nor would the definition applied by Hobbs accurately reflect the understanding of the person having ordinary skill in the art as to what a data warehouse is at the time of filing the present application.

IIT-169   1

7.   Accurate explanations and definitions of the meaning of a "data warehouse" at the time of filing the present application have been supplied with Applicants' previous Amendment A .

All statements herein made of the declarant's own knowledge are true and all statements made on information and belief are believed to be true.

Ophir Frieder   3/1/04
                                                 date